

### **REMARKS**

Claims 1, 4, 9, 12, 22, 27, 29-40, 42-45, and 47-49 are pending in the present application. Claims 41 and 46 have been canceled above. Claims 1, 9, 22, 27, 33, 35, 37, 39, 42, and 49 have been amended. Claims 1, 9, and 33 are independent claims. The Examiner is respectfully requested to reconsider the outstanding rejections in view of the above amendments and the following remarks.

#### ***Interview on March 26, 2007***

Applicants wish to thank Examiner Mylinh Tran for taking the time to conduct a personal interview with Applicants' representative, Jason Rhodes (Reg. No. 47,305), to discuss the above-identified application. The substance of the interview is as follows:

**Claims Discussed:** Claim 1.

**Prior Art Discussed:** U.S. Patent No. 5,463,725 to Henckel et al. (hereafter "Henckel"); U.S. Patent No. 6,611,291 to Dow et al. (hereafter "Dow").

**Proposed Amendments:** The above amendment of claim 1 was proposed and discussed during the interview.

**General Results:** During the interview, the Examiner said that the proposed amendment of claim 1 appeared to distinguish over Henckel and Dow. However, the Examiner indicated that further consideration/search would be necessary upon the filing of an Amendment.

#### ***Rejections Under 35 U.S.C. § 103***

##### **Henckel and Dow**

Claims 1, 9, 22, 27, 33-35, 37, 39, 42-45 and 47-49 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,463,725 to Henckel et al. (hereafter

“Henckel”) in view of U.S. Patent No. 6,611,291 to Dow et al. (hereafter “Dow”). This rejection is respectfully traversed.

Initially, Applicants respectfully refer the Examiner to MPEP § 2143.03, which sets forth the following requirements for a proper rejection under 35 U.S.C. § 103:

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art.  
*In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).

As amended, independent claims 1 and 9 recite displaying another immersive reading page in response to the user tapping the interactive region in which the page number is displayed. Independent claim 33 recites displaying another immersive reading page in response to the user tapping the interactive region in which an immersive page element is displayed. Applicants respectfully submit that neither Henckel nor Dow teaches such features.

Henckel requires the user to *drag* his finger or pointing device *across the screen* in order to “turn the page,” i.e., display another page. See abstract, col. 2, lines 50-65. In fact, in order to know which page is being turned, Henckel’s invention must determine the direction in which the finger/pointing device has been dragged. See col. 2, 60-65 (right-to-left motion causes subsequent pages to be displayed); col. 3, lines 51-55 (left-to-right motion causes previous pages to be displayed). Thus, Henckel does not teach or suggest tapping an interactive region to display a new page, as claimed.

As to Dow, this reference teaches the use of navigational buttons 42, 44, 46, and 48 to navigate between different images stored in memory. Thus, navigational buttons are *not* interactive regions of the displayed image. Instead, Dow’s navigational buttons are hardware buttons on the *housing* of the device, *alongside* the display screen 24. See Figs. 1A-1C, col. 4, line 66 – col. 4, line 4.

It is noted that, in the Office Action, the Examiner refers to the directional arrows of Figs. 6 and 9A in Dow as showing a “navigation button associated with a page number.” However,

these directional arrows are *not* interactive. Applicants respectfully refer the Examiner to col. 8, lines 37-45, of Dow, which states:

“Upon successfully capturing an image, the image is displayed as a thumbnail size icon as illustrated in Fig. 6 on the display 24 (Fig. 1A), together with a descriptor, also referred to as a license plate, which communicates the location which the image holds in memory with respect to other saved images. Directional arrows are also included on the license plate to communicate to the user which navigational buttons may be used to navigate among the images in memory.” (Emphasis added.)

As described in the above passage, the directional arrows in Fig. 6 of Dow merely indicate which of the navigational buttons 42, 44, 46, and 48 next to the screen 24 may be used. Dow further teaches that the directional arrows of Fig. 9A merely indicate which of navigational button(s) may be used (see col. 9, lines 41-56). Accordingly, the directional arrows of Figs. 6 and 9A are *not* interactive regions, and the user *cannot* display another image or page by tapping these arrows.

Thus, neither Henckel nor Dow teaches or suggests the feature of displaying another immersive reading page in response to the user tapping an interactive region, as claimed. At least for this reason, Applicants respectfully submit that claims 1, 9, and 33 are in condition for allowance, and claims 22, 27, 34, 35, 37, 39, 42-45 and 47-49 are allowable at least by virtue of their dependency on allowable claims. Thus, reconsideration and withdrawal of this rejection is respectfully requested.

### **Henckel, Dow, and “Well-Known” Teachings**

Claims 29, 31, 36, 38, and 40 further stand rejected under § 103(a) as being unpatentable over Henckel and Dow. This rejection is respectfully traversed.

**Claims 29 and 31:**

As to claims 29 and 31, the Examiner acknowledges that Henckel and Dow fail to teach displaying only one immersive reading page at a time. However, the Examiner asserts, “implementation of displaying in [sic] one page was well known in the art” (Office Action at page 7).

Without making any admission regarding this assertion, Applicants respectfully submit that this allegedly “well-known” feature fails to remedy the deficiencies of Henckel and Dow set forth above in connection with independent claims 1 and 9. Thus, claims 29 and 31 are allowable at least by virtue of their dependency on allowable independent claims. Accordingly, the Examiner is respectfully requested to reconsider and withdraw this rejection.

**Claims 36, 38, 40:**

As to the rejection of claims 36, 38, and 40, the Examiner asserts that “a title of a book” was well known in the art. However, it is unclear how the Examiner intends to modify Henckel and Dow to come up with the invention and, thus, further clarification is needed from the Examiner. Regardless, Applicants respectfully submit that the allegedly well-known teaching of “a title of a book” does not remedy the deficiencies of Henckel and Dow, as set forth above in connection with independent claims 1, 9, and 33. Accordingly, claims 36, 38, and 40 are allowable at least by virtue of their dependency on allowable independent claims. Therefore, reconsideration and withdrawal of this rejection is respectfully requested.

**Henckel, Dow, and Ho**

Claims 4, 12, 30, and 32 stand rejected under § 103(a) as being unpatentable over Henckel and Dow, and further in view of U.S. Patent No. 6,407,757 to Ho (hereafter “Ho”). Applicants respectfully submit that Ho fails to remedy the deficiencies of Henckel and Dow set forth above in connection with independent claims 1, 9, and 33. Particularly, the Examiner merely relies on Ho for its alleged teachings of invoking a training mode and providing audio

indicators to teach the association (see Office Action at page 8). Thus, Applicants respectfully submit that claims 4, 12, 30, and 32 are allowable at least by virtue of their dependency on independent claims 1, 9, and 33.

### *Conclusion*

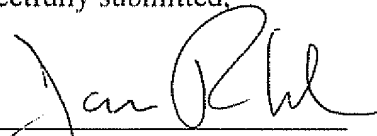
In view of the above amendments and remarks, the Examiner is respectfully requested to reconsider the outstanding rejections and issue a Notice of Allowance in the present application.

Should the Examiner believe that any outstanding matters remain in the present application, the Examiner is respectfully requested to contact Jason W. Rhodes (Reg. No. 47,305) at the telephone number of the undersigned to discuss the present application in an effort to expedite prosecution.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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